

FEB 11 1993



January 27, 1993

Ms. Donna Searcy, Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, DC 20554

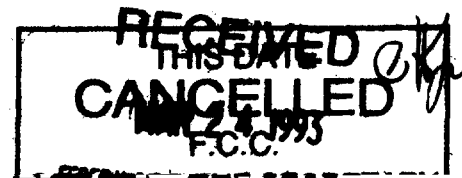
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Even a cursory examination of the ownership patterns of cable systems in urban areas will show extensive consolidation of urban and suburban franchises into large cable systems covering large geographic areas.

Even if the Commission were to demand uniform pricing over large geographic areas, we are concerned that the creation of new service classifications could be resorted to in order to defeat the intent of a requirement for uniform rates. Total has witnessed special "classes" established for RV parks, hotels, motels, and private homes in gated communities. We believe the price generally bears no relation to cost savings, but is rather aimed at holding off the new competitor. We literally have seen prices drop to less than one-half of previous levels for these selective buyers solely because of the arrival of a competitor. This is no surprise. Deep discounting by the first operator prevents the new competitor from having an initial "bankable" revenue stream and results again in a cross-subsidy from the non-discounted service area.

Allowing the proliferation of classes would be difficult to police and would, in final analysis, defeat the aim of uniform pricing.

Your cooperation will be appreciated.

Yours truly,

Total TV of California, Inc.



James F. Fitzgerald, Jr.
President

JFF:lso